



Pacific County Sheriff's Office

Sheriff John Didion

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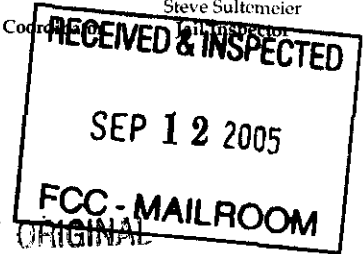
Steve Sultemeier
Call Inspector

September 2, 2005

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW Washington, DC 20554

05-196

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Dear Ms. Dortch,

It is currently the policy of the FCC to allow citizen access to E911 services through un-initialized cell phones, being cell phones that are no longer are in use by a cellular service subscriber. As long as the battery is charged the cell phone is able to dial 911 for emergency services. This policy has created nightmarish circumstances for many Public Safety Answering Points (PSAPs) across the United States.

Pacific County is a relatively rural county bordering the Columbia River in Washington State. The county faces a number of significant challenges in meeting our communications needs, which are exacerbated by continual technological changes and advances that strain the county's budgetary capabilities. In particular, challenges with cellular E911 call taking have hindered our mission in meeting critical public safety and public service communications needs.

All public safety jurisdictions in Pacific County utilize Pacific County Communications for E911 services and public safety dispatching. Being a smaller populated county, the local E911 network is limited to six wireline E911 trunks and two wireless E911 trunks.

Between the dates of March 6 and March 13, 2005, Pacific County Communications fielded over 800 wireless E911 calls from one caller utilizing one un-initialized cell phone. This number of calls over the time period in question effectively shut down Pacific County Communication's capacity to field valid E911 wireless calls. No call could be ignored any call could be a valid call from other citizens.

Due to number porting, the cell phone number was virtually impossible to track. Systems set up to do so did not work and the cell phone service providers were not helpful.

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Ms. M. Dortch
Sept. 2, 2005
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I have learned on an informal basis of similar incidents within PSAPs across the country. It is essential that communications centers be able to block or stop incidents of this type in order to be able to serve the legitimate needs of their residents. It is imperative that this policy be re-visited and rules be changed to make tracking of this type of call efficient. Please ensure that the Commission considers a change in the rules to support the public safety interests of the citizens of this country.

Sincerely,

John L. Didion

SHERIFF

A handwritten signature in black ink, appearing to read "Stephanie K. Fritts", with a large, stylized flourish extending to the right.

Stephanie K. Fritts

E911 Coordinator